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Exhibit No. 9

Ameren – Exhibit 9
Laura Moore
Rebuttal Testimony
File No. ER-2022-0337

Exhibit No.:
Issue(s): Dues & Donations; EEI
Witness: Laura M. Moore
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Union Electric Company
File No.: ER-2022-0337
Date Testimony Prepared: February 15, 2023

MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. ER-2022-0337

REBUTTAL TESTIMONY

OF

LAURA M. MOORE

ON

BEHALF OF

UNION ELECTRIC COMPANY

D/B/A AMEREN MISSOURI

**St. Louis, Missouri
February 2023**

REBUTTAL TESTIMONY

OF

LAURA M. MOORE

FILE NO. ER-2022-0337

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I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Laura M. Moore. My business address is One Ameren Plaza, 1901 Chouteau Ave., St. Louis, Missouri.

Q. Are you the same Laura M. Moore that submitted direct testimony in this case?

A. Yes, I am.

Q. To what testimony or issues are you responding?

A. My rebuttal testimony responds to Staff witness Antonija Nieto's direct testimony regarding Edison Electric Institute ("EEI") dues.

Q. Please explain Staff's position on EEI dues as discussed in Staff witness Nieto's testimony.

A. Staff has excluded EEI dues in the amount of approximately \$600,000 from Ameren Missouri's revenue requirement because of EEI's involvement in lobbying activities.

Q. Do you agree that a portion of EEI's dues should be excluded in support of the lobbying activities?

A. No additional amount needs to be removed from the Company's revenue requirement. Ameren Missouri recorded the lobbying portion of the EEI dues "below-the-line" and, as the Commission is aware, any costs recorded "below-the-line" are already excluded from

1 the revenue requirement calculated by Ameren Missouri in the Company's direct filing. To
2 exclude any additional amounts would be excluding that amount twice.

3 **Q. Staff includes a list of lobbying work that EEI was involved in during 2022.**
4 **Is that an exhaustive list of EEI activities and benefits received by Ameren Missouri?**

5 A. No. The Staff testimony only discusses the lobbying activities of EEI, but Staff
6 witness Nieto admits that there are several EEI activities that benefit ratepayers.

7 **Q. What are the other considerations that justify including membership dues**
8 **in Ameren Missouri's revenue requirement?**

9 A. Ms. Nieto includes a quote from a prior KCP&L Case regarding this topic,
10 which states that benefits to ratepayers must be considered. In KCP&L Case No. ER-82-66,
11 the Commission stated the following: "...until the Company (KCP&L) can better quantify the
12 benefit and the activities that were the causal factor of the benefit, the Commission must
13 disallow EEI dues as an expense."¹

14 **Q. Did the Company provide any testimony quantifying the benefits of its**
15 **membership in EEI?**

16 A. Yes, I quantified specific benefits in my direct testimony, which Ms. Nieto
17 neither addressed nor disputed. In that testimony, I also discussed the many benefits of our
18 membership in EEI. Regarding quantified benefits, I specifically demonstrate that the
19 Company's participation in the EEI Mutual Assistance Program saved the Company between
20 \$5 and \$6 million in the test year alone. Although I do not attempt to quantify all of the benefits
21 received from EEI, this benefit from the Mutual Assistance Program participation alone justifies
22 the cost of Ameren Missouri's EEI dues.

¹ See *In the Matter of Kansas City Power & Light Co.*, 28 MO P.S.C. (N.S.) 228, 259 (1986).

Rebuttal Testimony of
Laura M. Moore

1 **Q. Does this conclude your rebuttal testimony?**

2 **A. Yes, it does.**

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Union Electric Company)
d/b/a Ameren Missouri’s Tariffs to Adjust) Case No. ER-2022-0337
Its Revenues for Electric Service.)

AFFIDAVIT OF LAURA M. MOORE

STATE OF MISSOURI)
) ss
CITY OF ST. LOUIS)

Laura M. Moore, being first duly sworn states:

My name is Laura M. Moore, and on my oath declare that I am of sound mind and lawful age; that I have prepared the foregoing *Rebuttal Testimony*; and further, under the penalty of perjury, that the same is true and correct to the best of my knowledge and belief.

/s/ Laura M. Moore
Laura M. Moore

Sworn to me this 15th day of February, 2023.